

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. _____
v. : DATE FILED: _____
ANTHONY ADAMS : VIOLATIONS: 18 U.S.C. § 371
SHAKIRA WILLIAMS (Conspiracy - 1 Count)
ANDREW HINES 18 U.S.C. § 2113(a)
(Bank robbery - 4 Counts)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, the deposits of First Trust Bank, Citizens Bank, PNC Bank, and Wachovia Bank were insured by the Federal Deposit Insurance Corporation.
2. From in or about at least August 2, 2003 through on or about October 28, 2003, in the Eastern District of Pennsylvania, defendants

ANTHONY ADAMS,
SHAKIRA WILLIAMS, and
ANDREW HINES

conspired and agreed together and with persons known and unknown to the grand jury to commit bank robbery, in violation of 18 U.S.C. § 2113(a).

MANNER AND MEANS OF THE CONSPIRACY

It was part of the conspiracy that:

1. Defendants ANTHONY ADAMS, SHAKIRA WILLIAMS and ANDREW HINES looked for banks that did not have security measures such as guards stationed in the bank or bulletproof glass in front of the tellers.

2. Defendants ANTHONY ADAMS, SHAKIRA WILLIAMS and ANDREW HINES entered the banks wearing disguises, presented the tellers with notes warning them to do as they were told by the defendants, and demanded United States currency in large bills.

OVERT ACTS

In furtherance of the conspiracy, the following overt acts were committed within the Eastern District of Pennsylvania:

First Trust Bank, Jenkintown

1. On or about August 2, 2003, defendants ANTHONY ADAMS, SHAKIRA WILLIAMS and ANDREW HINES entered the First Trust Bank, 261 Old York Road, Jenkintown. Defendant ANTHONY ADAMS was wearing a fake mustache, goatee and sunglasses. Defendant SHAKIRA WILLIAMS was wearing a robe and head covering so that only her eyes were visible. Defendant ANDREW HINES was wearing a baseball cap and sunglasses.

2. Defendants ANDREW HINES and SHAKIRA WILLIAMS presented notes to two tellers, demanded money, and got \$10,425 in United States currency.

Citizens Bank, Chestnut Hill

3. On or about September 3, 2003, defendants ANTHONY ADAMS and ANDREW HINES entered the Citizens Bank at 8616 Germantown Avenue, Chestnut Hill. Defendant ANTHONY ADAMS was wearing a fake beard, a long robe, and a cap. Defendant ANDREW HINES was wearing a robe and head covering so that only his eyes were visible.

4. Defendant ANDREW HINES presented a demand note to the teller, who

responded that she did not have any large bills.

5. Defendants ANDREW HINES and ANTHONY ADAMS left the bank and entered a car driven by defendant SHAKIRA WILLIAMS.

Sovereign and Citizens Banks, Cheltenham

6. On or about September 4, 2003, defendants ANTHONY ADAMS, SHAKIRA WILLIAMS, and ANDREW HINES looked into the windows of the Sovereign and Citizens Banks at Cedarbrook Plaza, Cheltenham to determine whether they were potential robbery targets. Defendant ANTHONY ADAMS was wearing a fake beard, a long robe, and a cap. Defendant SHAKIRA WILLIAMS was wearing a robe and head covering so that only her eyes were visible. Defendant ANDREW HINES was wearing a robe and a cap.

7. The defendants left the area after seeing a security guard in the Citizens Bank.

PNC Bank, Flourtown

8. On or about September 4, 2003, defendants ANTHONY ADAMS and ANDREW HINES entered the PNC Bank at 1316 Bethlehem Pike, Flourtown. Defendant ANTHONY ADAMS was wearing a fake beard, a long robe, and a cap. Defendant ANDREW HINES was wearing a robe and head covering so that only his eyes were visible.

9. The defendants waited in line for a short while and left before reaching the counter where the tellers worked.

10. After leaving the bank, defendants ANTHONY ADAMS and ANDREW HINES entered a car registered to defendant ANDREW HINES, which was driven by defendant SHAKIRA WILLIAMS.

Wachovia Bank, Conshohocken

11. On or about September 8, 2003, defendants SHAKIRA WILLIAMS and ANTHONY ADAMS entered the Wachovia Bank at 1920 Butler Pike, Conshohocken. Defendant ANTHONY ADAMS was wearing a fake beard, a stocking cap, and sunglasses. Defendant SHAKIRA WILLIAMS was wearing a robe and head covering so that only her eyes were visible.

12. Defendants SHAKIRA WILLIAMS and ANTHONY ADAMS approached separate tellers with notes, demanded money and got \$10,425 in United States currency.

13. The defendants left the bank and entered a vehicle in which defendant ANDREW HINES was waiting.

Wachovia Bank, Philadelphia

14. On or about October 28, 2003, defendants SHAKIRA WILLIAMS and ANTHONY ADAMS entered Wachovia Bank, 1246 Hunting Park Avenue, Philadelphia. Defendant ANTHONY ADAMS was wearing a fake beard, a wig, and sunglasses. Defendant SHAKIRA WILLIAMS was wearing a robe and head covering so that only her eyes were visible.

15. The defendants presented the tellers with demand notes and received \$21,000 in United States currency.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 2, 2003, at Abington, in the Eastern District of Pennsylvania,
defendants

ANTHONY ADAMS,
SHAKIRA WILLIAMS, and
ANDREW HINES

knowingly and unlawfully took, and aided and abetted the taking, by force and violence, and by intimidation, from employees of First Trust Bank, 261 Old York Road, Abington, property and money, that is, approximately \$10,425 in United States currency, belonging to and in the care, custody, control, management and possession of First Trust Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 3, 2003, at Philadelphia, in the Eastern District of
Pennsylvania, defendants

ANTHONY ADAMS,
SHAKIRA WILLIAMS, and
ANDREW HINES

knowingly and unlawfully attempted to take, and aided and abetted the attempted taking, by
force and violence, and by intimidation, from employees of Citizens Bank, 8616 Germantown
Avenue, Philadelphia, property and money, belonging to and in the care, custody, control,
management and possession of Citizens Bank, the deposits of which were insured by the Federal
Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 8, 2003, at Conshohocken, in the Eastern District of Pennsylvania, defendants

ANTHONY ADAMS,
SHAKIRA WILLIAMS, and
ANDREW HINES

knowingly and unlawfully took, and aided and abetted the taking, by force and violence, and by intimidation, from employees of Wachovia Bank, 1920 Butler Pike, Conshohocken, property and money, that is, approximately \$11,715 in United States currency, belonging to and in the care, custody, control, management and possession of Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 28, 2003, at Philadelphia, in the Eastern District of
Pennsylvania, defendants

ANTHONY ADAMS and
SHAKIRA WILLIAMS

knowingly and unlawfully took, and aided and abetted the taking, by force and violence, and by
intimidation, from employees of Wachovia Bank, 1246 East Hunting Park Avenue, Philadelphia,
property and money, that is, approximately \$21,000 in United States currency, belonging to and
in the care, custody, control, management and possession of Wachovia Bank, the deposits of
which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a) and 2.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney